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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit

Chapter 7

**CHAPTER 7 TRUSTEE'S
MOTION TO LIMIT NOTICE OF
FIRST INTERIM CHAPTER 7
FEE APPLICATION OF THE
POTOMAC LAW GROUP PLLC
(OCTOBER 1, 2020 – JANUARY
29, 2021)**

Mark D. Waldron, in his capacity as the duly-appointed Chapter 7 Trustee, hereby moves (the “Motion”) the Court for entry of an Order, in the form attached hereto as **Exhibit A**, permitting limited notice of the *First Interim Chapter 7 Fee Application of the Potomac Law Group PLLC (October 1, 2020 – January 29, 2021)* (the “PLG First Interim Fee Application”).

This Court has jurisdiction over this Motion under 28 U.S.C. §§157 and 1334. This Motion raises a core matter. 28 U.S.C. §157(b)(2)(A).

Rule 2002(a)(6) of the Federal Rules of Bankruptcy Procedure (“BR”) requires 21-days’ notice of the Application. *See also* L.B.R. 2016-1 (requiring service on 21-days’ notice to the Master Mailing List). However, BR 2002(m) Motion to Limit Notice of
PLG Fee Application - Page | 1

1 permits the Court to enter orders designating the manner and scope of notice.
2 Further, L.B.R. 2002-1(b)(1)(B) allows “less inclusive notice . . . if not prohibited
3 by the Code or Rules and specifically allowed by the Court or local rules.” This
4 local rule also states, “Notice is appropriate if it reaches all those with a potential
5 good faith objection to the proposed order or action.” L.B.R. 2002-1(b)(1)(B).

6 The Master Mailing Matrix for this case includes 414 mailable addresses.
7 Photocopying and postage expenses as well as other expenses associated with
8 such large mailings would be extremely burdensome and costly to the estate.
9 Furthermore, the PLG First Interim Fee Application is interim and subject to final
10 review where all creditors, may be given notice. Therefore, the Trustee requests
11 that notice of the PLG First Interim Fee Application and of this Motion, in
12 substantially the form attached hereto as **Exhibit B**, be sent only to the following
13 parties (the “Limited Mailing List”): (i) the United States Trustees Office; (ii)
14 David Carlson, the Debtor’s director; (iii) Andrey Kuzenny, who signed the
15 petition and schedules on the Debtor’s behalf; (iv) holders of allowed Chapter 11
16 administrative claims; (v) holders of the ten largest trade claims; (vi) holders of
17 the ten largest token and miner claims. All parties registered with the ECF system
18 will receive notice electronically. The Limited Mailing List includes all those with
19 a potential good faith objection to the PLG First Interim Fee Application.

20 WHEREFORE, the Trustee requests entry of an Order:

- 21 1. Granting this Motion in its entirety;
- 22
- 23

1 2. Finding that the form of Notice, substantially in the form attached
2 hereto as **Exhibit B**, is appropriate and sufficient;

3 3. Authorizing the Trustee to limit notice of the PLG First Interim Fee
4 Application to the Limited Mailing List; and

5 4. Granting such other and further relief as the Court deems appropriate
6 and just.

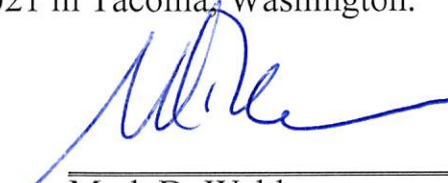
7 Dated: March 10, 2021

POTOMAC LAW GROUP PLLC

8
9 By: /s/ Pamela M. Egan
Pamela M. Egan (WSBA No. 54736)
10 *Attorneys for Mark D. Waldron, Chapter 7*
Trustee, Plaintiff

11 I, Mark D. Waldron, declare based on my personal knowledge, that the
12 foregoing is true and correct.

13 Dated this 8th day March 2021 in Tacoma, Washington.

14
15 
16 Mark D. Waldron